

modify these designations based on circumstances as they may evolve prior to the commencement of trial.

GENERAL OBJECTIONS AND COMMENTS:

Plaintiffs object to all testimony designated by Defendants that is directed at issues regarding inequitable conduct, equitable estoppel, laches, or other equitable issue, including but not limited to testimony related to intent to deceive the PTO, Jerry Moscovitch's or Mass's alleged knowledge of prior art or pre-critical date sales, uses, or publications, intent to claim narrowly in the original patent application, and anything related to deceptive reissue. Plaintiffs object to this testimony being presented to the jury on relevance grounds and on a Rule 403 basis.

Plaintiffs object to testimony that is privileged and has not been waived, including but not limited to the testimony of Plaintiffs' former attorneys Mirek Warek and Mark Elchuk.

Plaintiffs object to testimony by Susan Calzone, Ed Duffy, and Sean Roarty as to any Bloomberg employee's alleged invention of the patent or misnaming of inventors on the '978 patent.

Plaintiffs reserve the right to object to any testimony that is excluded based upon a motion in limine or motion to strike.

Plaintiffs have not re-designated as counterdesignations testimony that was designated in their original deposition designations. Plaintiffs reserve the right to use any previously-designated testimony as a counterdesignation.

Plaintiffs do not waive any other objection and reserves the right for further objections at trial.

**DEPOSITION EXCERPT OBJECTIONS AND
COUNTER-DESIGNATIONS FROM
DEPOSITION TESTIMONY OF SUSAN CALZONE
Date of Deposition: May 8, 2008**

From		To		Objection
Page	Line	Page	Line	
16	8	16	10	Leading
18	6 "And	18	19	Hearsay
19	23	20	1	Foundation; Hearsay Form (vague – "Bloomberg flat panel" and assumes involvement)
20	2	21	3	Foundation; Hearsay Form (vague – "Bloomberg flat panel" and assumes involvement); Relevance; 403
21	4	21	17	Foundation; Form (assumes her involvement)
21	22	22	22	Foundation; Relevance; 403
23	2	23	13	Relevance; 403
25	21	26	18	Form (vague – "initial designation" and assumes facts not in evidence)
27	8	27	16	Relevance; 403; Foundation (vague – "initial designation of Bloomberg 2")
27	17	27	22	Relevance; 403
27	23	28	22	Relevance 403; Leading
29	3	30	5	Relevance; 403
30	6	30	11	Relevance; 403; 602
30	12	30	15	Relevance; 403
31	5	31	15	Relevance; 403
31	24	33	3	Relevance; 403
34	9	34	17	Counter-Designation; Reading
36	5	36	8	Counter-Designation; completeness
36	18	37	4	602; Foundation
37	5	38	1	Leading
39	17	39	21	Leading
42	25	43	10	Relevance; 403
43	20	43	20	Incomplete; no question
44	6	44	12	Leading; Relevance; 403
48	21	49	14	602

49	15	50	11	Leading; 602; Form (speculation)
52	2	52	24	602; leading
52	25	53	15	602; leading
54	5	58	1	602; Form (speculation)
58	18	59	2	Counter-Designation
59	22	59	25	Form (misleading evidence as to "Bloomberg manufactured")
60	25	61	12	602; Form (speculation)
61	19	61	25	Form (speculation)
62	1	62	18	Non-responsive
62	21	63	10	602 Form (speculation); leading
63	15	63	24	602; Form (speculation); non-responsive
64	1	64	5	602; Form (speculation); non-responsive
64	6	65	1	602; Form (speculation)
66	13	66	21	602; Leading
67	20	68	9	602; Form (speculation)
68	18	68	25	602; Form (speculation)
69	1	69	10	Form (asked and answered)
69	25	70	4	602
70	22	71	8	602; Form (speculation)
71	21	72	12	Leading
73	3	73	13	Leading
76	4	76	9	Counter-Designation
76	10	76	21	Leading; 602
76	25	77	6	Leading
77	7	77	18	602; Form (speculation)
78	5 "Also	78	7	Non-Responsive
79	18	79	23	Leading
79	24	70	8	IEC
80	9	80	14	IEC; 602; Form (speculation)
81	16	81	21	Leading
81	22	82	11	Leading; IEC
82	12	83	1	Leading
83	3	85	12	602; Form (speculation)
86	11	86	15	Leading
86	25	87	8	Leading
89	22	90	2	Leading
91	4	91	9	Leading
91	20	91	24	Leading
94	14	94	20	Foundation; 602
96	12	97	5	Leading
97	6	97	14	602; Foundation; Leading

97	15	97	20	602; Foundation; Leading
97	23	98	7	IEC; Leading; 602
98	14	98	23	602; IEC; Foundation
99	2	99	20	IEC; Leading
101	24	102	3	Leading; IEC
102	5	102	16	Incomplete
102	17	102	18	Counter-Designation for completeness
104	7	104	25	Form (speculation); 602
105	1	105	10	602; Form (speculation)
108	8	108	12	Leading
108	13	108	22	Leading; form (vague)
109	1	109	4	602; Form (speculation)
112	1	112	18	Leading (strike as non-responsive)
113	15	113	24	Leading
113	25	114	11	Form (vague)
115	1	116	3	Relevance; 403
116	4	117	3	Relevance; 403; Leading
117	4	117	13	Relevance; 403
118	6	118	19	Leading
120	12	120	23	NBE; Leading; 701
122	3	123	23	Relevance; 403; Leading
125	6	126	2	Relevance; 403
126	3	126	11	IEC
126	12	127	1	IEC; Leading
127	19	128	8	Relevance; 403
128	9	128	12	Relevance; 403; incomplete
128	13	128	15	Relevance; 403; Leading; incomplete
128	16	130	6	Relevance; 403; Form (vague); Leading
130	7	130	12	Relevance; 403; 701, NBE; Foundation
140	1	140	2	602; strike as non-responsive
141	16	141	20	602
173	7	174	11	Relevance; 403
181	14	181	16	Counter-designation
181	21	182	2	Counter-designation
184	5	184	16	Form (mischaracterizes document and prior testimony)
184	17	185	1	Leading

**DEPOSITION EXCEPRT OBJECTIONS AND
COUNTER-DESIGNATIONS FROM
DEPOSITION TESTIMONY OF RICHARD ROBERT COULSON
Date of Deposition: August 26, 2008**

From		To		Objection
Page	Line	Page	Line	
10	6	10	15	Leading; Form (vague "routine part")
13	7	13	17	Hearsay; Relevance
14	20	15	1	Counter-Designation
15	21	15	24	Incomplete – no answer
16	17	16	19	Hearsay; Relevance
21	20	21	23	Counter-Designation
23	17	23	21	Leading
24	4	24	16	Hearsay; Relevance; Form (misrepresents evidence); Attorney colloquy
28	1	28	5	Counter-Designation
28	11	28	14	Leading
29	7	29	13	Counter-Designation
29	14	29	19	Leading
29	22	29	23	Relevance
32	8	32	15	Relevance; Hearsay
36	25	36	2	Leading
39	15 "It is	39	19	Hearsay; Relevance
40	15	40	17	Counter-Designation
41	18	41	20	Counter-Designation
46	16	46	18	Counter-Designation
49	21	49	22	Form (mischaracterizes testimony); Incomplete
51	2	51	4	Hearsay; Relevance; Incomplete
52	21	52	24	Leading
53	4	54	10	Form (compound); Leading
55	8	55	10	Leading
55	16	55	25	Form (mischaracterizes testimony, assumes facts not in evidence)
57	16	57	20	Leading
58	13	58	14	Incomplete
63	2	63	9	Form (speculation)
63	13	63	20	Form (speculation)
66	3	66	5	Form (vague – "same problem", "earlier in exhibit")

66	9	66	18	Leading
68	24	69	4	Counter-Designation
70	17	71	1	Leading
71	2	71	12	Counter-Designation
72	13	72	18	Leading; Form (vague)
73	4	73	12	Counter-Designation
74	15	74	19	Incomplete
77	9	77	14	Leading
79	20	80	11	Counter-Designation
80	15	80	20	Hearsay; Incomplete
82	15	82	23	Counter-Designation
83	23	84	17	Counter-Designation
92	17	92	22	Leading; 602; 701
92	25	94	14	701; Foundation; 602
98	2	98	12	701; 602; Foundation
98	15	98	20	Leading
99	9	99	13	Counter-Designation
99	14	100	9	701; 602; Foundation
100	14	100	15	Counter-Designation
101	5	101	7	Leading
101	12	101	21	Counter-Designation
101	25	102	5	701; 602; Foundation; Leading
102	10	102	21	701; 602
102	24	103	3	Leading; 701; 602
103	6	103	6	701; 206
103	14	103	14	701; 206
103	21	104	8	701; Leading
104	11	104	15	Leading; 701
104	18	104	23	Leading; 701
105	9	105	10	Leading; 701
105	13	105	13	Leading; 701
105	16	105	20	701; Leading
105	25	106	13	701; Leading
106	16	106	25	701
107	1	107	2	701; Leading
107	5	107	5	701; Leading
107	6	107	17	701
108	25	110	11	701
110	12	110	16	Form (vague); Leading
111	7	111	12	Counter-Designation
112	2	112	19	Counter-Designation
112	20	112	22	Incomplete
113	1	113	5	701
113	8	113	9	Incomplete
113	13	113	114	Leading; 701
113	19	114	2	Leading; 701

114	7	114	16	Non-responsive
114	24	115	8	Form (vague); Leading
115	24	116	3	Leading; 701
116	8	116	15	701; 602; Leading
116	18	116	20	701; 602
116	24	116	24	701; 602
117	1	117	7	701; 602
117	10	117	11	701; 602
117	15	117	15	701; 602
117	17	118	8	701; 602
118	11	118	19	Leading
118	22	119	5	Form (assumes facts); Leading
119	7	120	14	701
120	24	121	3	Form (asked and answered); 701; 602
121	7	121	10	Form (asked and answered); 701; 602
121	16	121	17	Leading; 701
121	22	121	22	Leading; 701
121	25	122	4	Leading; 701
122	7	122	18	Leading; 701
122	21	123	5	Leading; 701
123	11	123	12	Leading
123	17	124	9	Counter-Designation; Completeness
124	10	125	1	701; Form (compound); Form (mischaracterizes testimony)
125	4	125	13	701
125	16	126	1	701
126	4	126	7	Counter-Designation
145	5	145	12	Form (vague); Form (mischaracterizes testimony); Leading
148	9	148	14	Counter-Designation
149	6	149	17	Hearsay; Relevance
149	18	149	25	Relevance
150	7	150	22	Counter-Designation
158	13	158	14	Counter-Designation
159	5	159	18	Counter-Designation
159	20	159	21	Counter-Designation
161	1	161	3	Counter-Designation
164	19	164	23	Counter-Designation

**DEPOSITION EXCEPRT OBJECTIONS AND
COUNTER-DESIGNATIONS FROM
DEPOSITION TESTIMONY OF EDWARD DUFFY**
Date of Deposition: May 8, 2008

From		To		Objection
Page	Line	Page	Line	
20	13	20	21	Leading
21	20	21	25	Leading; Form (vague)
22	1	22	7	Leading; Form (vague)
23	1	23	6	Leading
28	1	28	4	Leading
28	6	28	9	Leading
29	7	29	8	Leading
29	11	29	22	Leading
31	13	31	19	Leading; IEC
32	1	32	8	IEC
32	17	32	21	Leading
32	25	33	2	Leading
33	5	33	8	Leading
35	6	35	10	Form (vague)
36	5	36	8	Foundation; Form (speculation); 602
38	16	38	20	Leading; Form
42	7	42	18	Relevance; 403; Hearsay
43	4	43	19	Hearsay
44	9	44	16	Form
44	17	44	22	Leading
45	13	46	2	Hearsay; Relevance; 403
46	15	47	10	Relevance; 403; Hearsay
47	11	48	1	Relevance; 403
48	21	49	10	Relevance; 403
49	11	50	14	Relevance; 403; Form (ague and misleading as to "ideas" "shown in Ex. 15")
50	15	51	2	Relevance; 403; Hearsay
51	3	51	25	Relevance; 403; Form (speculation)
52	6	52	13	Leading; Form (vague and misleading)
52	14	53	8	Leading; Relevance; 403; Hearsay
53	15	53	24	Leading; Hearsay; Relevance; 403
55	6	66	13	Leading; Relevance; 403; form (vague); Foundation
55	23	56	3	Leading; Foundation; Form

**DEPOSITION EXCEPRT OBJECTIONS AND
COUNTER-DESIGNATIONS FROM
DEPOSITION TESTIMONY OF MARK D. ELCHUK**

Date of Deposition: May 22, 2008

From		To		Objection
Page	Line	Page	Line	
8	23	9	11	Relevance; 403
26	7	26	15	IEC; 701; Relevance; 403
26	23	27	5	IEC; 701; Relevance; 403
34	14	34	18	701
34	20	34	23	701
35	8	35	14	701
35	16	36	7	701
36	15	36	24	701; IEC; Relevance; 403
37	19	37	23	Counter-Designation
39	23	41	19	Relevance; 403; IEC
41	23	42	12	602
43	11	44	3	701; Foundation; Form (vague)
44	4	44	9	701
44	10	44	18	701; Relevance; 403; IEC
45	1	45	15	701; Relevance; 403; IEC
47	9	47	14	Leading
47	22	48	1	Leading
48	3	48	7	701
48	13	48	25	Form (vague)
55	6	55	9	602
55	14	55	22	602
56	13	56	16	602
56	17	56	22	602; Leading; Form (speculation and mischaracterizes document)
57	25	58	3	Relevance; 403
58	4	58	6	Relevance; 403; IEC
58	7	59	14	Relevance; 403; IEC
59	19	59	21	602
60	6	60	12	701
60	13	60	20	602; Relevance; 403
60	24	61	8	Counter-Designation
61	15	61	25	Counter-Designation
68	12	68	20	Relevance; 403
68	24	69	21	Relevance; 403
85	10	85	15	Privilege
87	10	87	12	701; Relevance; 403
94	11	94	17	Leading; Relevance; IEC; 403
95	5	95	20	Leading; IEC; Relevance; 403

**DEPOSITION EXCEPRT OBJECTIONS AND
COUNTER-DESIGNATIONS FROM
DEPOSITION TESTIMONY OF BARBARA GOUZE
Date of Deposition: August 19, 2008**

Date of Deposition: August 19, 2008

**DEPOSITION EXCEPRT OBJECTIONS AND
COUNTER-DESIGNATIONS FROM
DEPOSITION TESTIMONY OF SEAN ROARTY**
Date of Deposition: April 29, 2008

From		To		Objection
Page	Line	Page	Line	
27	4	27	8	Form; Speculation; 403; Relevance; Foundation
27	17	27	22	Leading; Foundation; Form (vague)
27	23	28	9	Relevance; 403
28	10	28	13	Counter-Designation
28	25	29	5	Leading; 602
30	18	30	21	Incomplete; Relevance
30	22	31	10	Relevance; Attorney colloquy
33	9	33	12	Form; Speculation; 403; Relevance
33	16	33	21	Form; Speculation; Relevance
36	7	36	14	Leading; 602; Foundation
37	17	37	20	Leading; 602; Foundation
40	6	40	11	Form (vague and mischaracterizes as "product")
41	11	41	18	Relevance; attorney colloquy
42	1	42	5	Leading; NBE; 701; Relevance; 403
42	8	42	12	NBE; 701; Relevance; 403
42	13	42	24	NBE; 701; Relevance; 403; Leading
44	14	45	6	Relevance; attorney colloquy
46	17	46	21	Leading; Form (vague)
47	9	47	12	Form (vague)
48	6	48	16	602; Foundation
49	20	49	25	Incomplete
50	11	50	17	Leading
50	21	50	25	Leading; Form; Speculation; 602
51	5	51	8	Form (vague)
51	15	51	21	Leading; Form (compound)
51	22	52	1	Leading
52	20	52	25	Leading
53	1	53	5	Counter-Designation
54	4	54	11	602; Foundation; Form (speculation); Leading
55	23	56	2	Leading
59	4	59	7	Leading; Form (vague)

60	4	60	15	Leading
60	22	61	4	Counter-Designation
61	10	61	18	Form (assumes facts not in evidence); 602; Foundation
64	24	65	6	Leading; 602; Form (speculation)
67	19	67	15	602; Form; Speculation
69	7	69	11	Leading
71	13	71	18	602; Form; Speculation
75	9	75	20	602; form (speculation); IEC
77	16	77	21	Leading
79	9	79	13	602; Foundation
79	16	79	21	Leading
80	2	80	6	Leading
81	8	81	20	IEC
82	13	82	20	Leading
84	3	84	9	IEC; Form (speculation); 602; Relevance; 403
84	10	84	14	Leading
86	6	86	8	Leading
88	15	88	19	Leading
89	6	89	10	Leading
91	2	91	5	Leading
91	13	91	24	Leading; Form (vague); Speculation
92	2	92	12	Relevance; Attorney colloquy
93	13	93	17	Leading
93	18	93	24	602; Form (speculation)
96	10	96	14	IEC; Relevance; 403
96	15	96	25	Leading
97	5	97	13	Leading; Form (speculation); 602; Foundation
98	21	98	22	Counter-Designation (completeness)
100	5	100	12	Counter-Designation
100	21	101	2	IEC; Relevance; 403; Leading
101	24	102	3	Form (vague); Leading
103	23	104	19	Leading
107	10	107	18	Form; Speculation; 602
108	7	108	23	Leading
110	9	110	16	Leading
110	17	110	22	Leading; Form (vague)
111	21	111	24	Incomplete Question
116	14	116	16	Counter-Designation (completeness)
116	17	116	20	602

118	4	118	9	Leading
118	10	118	16	602
120	24	121	7	Leading; Form (mischaracterizes document)
122	13	122	19	Form (vague)
123	9	123	15	Leading
124	17	124	22	Relevance; 403; IEC
125	12	125	21	Leading; Form (vague)
128	21	130	23	IEC; Relevance; 403
130	24	135	10	IEC; Relevance; 403
135	17	135	22	Leading; IEC; 403; Relevance
136	15	137	8	Relevance; 403
137	9	137	14	Counter-Designation
139	17	140	10	Relevance; 403; IEC; NBE; Leading
156	10	156	20	Relevance; 403; IEC
157	21	158	9	Relevance; 403; IEC
158	11	159	2	Relevance; 403; IEC; Hearsay
159	3	159	7	Relevance; 403; IEC
160	10	160	12	Relevance; 403; IEC
160	20	161	2	Relevance; 403; IEC
162	22	163	17	Relevance; 403; IEC
164	24	165	7	Relevance; 403
167	6	167	13	Relevance; 403; IEC
167	23	168	14	Relevance; 403
168	15	169	2	Counter-Designation (for completeness; only if testimony above goes into evidence)
177	14	178	6	Counter-Designation (for completeness)
215	8	215	10	Counter-Designation
216	8	217	13	Relevance; 403; IEC; Leading; 701, 602
217	18	218	1	Leading; Relevance; 403
220	19	220	19	Incomplete
220	20	221	10	Leading; Form (mischaracterizes document)
224	20	225	10	Leading; 602
225	11	225	13	Relevance; 602
225	20	226	2	Leading; Relevance; 602
226	3	226	12	Relevance; 403; IEC

**DEPOSITION EXCEPRT OBJECTIONS AND
COUNTER-DESIGNATIONS FROM
DEPOSITION TESTIMONY OF DANIEL B. SCHWAB**
Date of Deposition: July 15, 2008

From		To		Objection
Page	Line	Page	Line	
6	12	6	20	Foundation
16	17	18	6	Incomplete
24	14	24	16	Counter-Designation
24	18	24	20	Counter-Designation
36	20	37	17	Incomplete
37	20	38	9	Counter-Designation
41	22	42	22	Counter-Designation
46	3	46	5	Counter-Designation
46	23	47	19	Foundation; 602
49	7	49	10	Incomplete
50	5	50	7	Counter-Designation
53	20	54	10	Foundation
55	8	55	14	Incomplete
55	17	56	9	701
56	14	57	8	Counter-Designation
57	9	57	15	Foundation
59	9	59	18	Foundation
60	2	60	11	Counter-Designation
66	25	67	3	Leading; 701
67	10	67	15	701
67	24	68	1	Incomplete; 701
68	9	69	2	701
69	6	70	6	701
71	9	71	21	701; Leading
73	5	73	10	Leading; 701
74	1	74	9	701
74	19	74	21	701
75	21	76	1	701
76	12	77	1	Counter-Designation
77	3	77	7	Counter-Designation
78	10	78	22	Foundation
78	24	78	25	Foundation
80	19	81	22	Counter-Designation
81	2	81	6	403
84	15	84	20	Counter-Designation
84	21	84	24	Foundation
84	25	85	7	Counter-Designation
85	24	87	8	Counter-Designation
87	10	87	10	Counter-Designation

**DEPOSITION EXCEPRT OBJECTIONS AND
COUNTER-DESIGNATIONS FROM
DEPOSITION TESTIMONY OF ERIC STAGEMAN**

Date of Deposition: August 19, 2008

**DEPOSITION EXCEPRT OBJECTIONS AND
COUNTER-DESIGNATIONS FROM
DEPOSITION TESTIMONY OF ALLAN TAMESHTIT
Date of Deposition: October 19, 2007**

**DEPOSITION EXCEPRT OBJECTIONS AND
COUNTER-DESIGNATIONS FROM
DEPOSITION TESTIMONY OF ALLAN TAMESHITT
Date of Deposition: January 18, 2008**

General objection to this deposition as irrelevant claim construction testimony. General objection to this deposition that any designated testimony is outside the scope of 30(b)(6) deposition, and any testimony; Mr. Tameshitt lacks personal knowledge for the designated portions; and improper expert testimony.

**DEPOSITION EXCEPRT OBJECTIONS AND
COUNTER-DESIGNATIONS FROM
DEPOSITION TESTIMONY OF ALLAN TAMESHTIT
Date of Deposition: August 27, 2008**

**DEPOSITION EXCEPRT OBJECTIONS AND
COUNTER-DISIGNATIONS FROM
DEPOSITION TESTIMONY OF MIREK A. WARAKSA
Date of Deposition: June 9, 2008**

From		To		Objection
Page	Line	Page	Line	
8	12	8	18	Form ("capacity")
12	14	12	19	603; Leading
20	13	20	17	Incomplete
20	19	20	23	Leading
23	4	23	8	Privilege
24	23	24	24	Attorney colloquy; Relevance
27	18	27	22	Relevance; 403
28	6	28	10	Relevance; 403
28	16	29	8	Relevance; 403
29	13	30	1	Relevance; 403
30	2	30	10	Relevance; 403
32	19	32	23	Leading
34	3	34	7	Leading
37	6	37	9	Privilege
38	5	38	12	Privilege
38	15	38	17	Privilege
39	2	39	4	Privilege
39	9	39	13	Privilege
39	14	39	23	602; Form (speculation)
41	10	41	21	Privilege
46	13	46	14	Relevance; 403; Incomplete
46	20	46	22	Relevance; 403; Incomplete
47	3	47	6	Incomplete
47	19 "and"	47	21	Privilege
49	23	51	9	Privilege
51	10	52	4	Relevance; attorney colloquy
52	5	52	12	Privilege
52	13	52	24	Relevance; attorney colloquy
52	25	54	20	Privilege; attorney colloquy
55	10	55	13	Privilege
56	9	56	11	Privilege
56	16	56	22	Privilege
57	2	57	6	Privilege
57	10	57	14	Privilege
57	18	58	1	Privilege
58	9	59	2	Privilege; Relevance; 403
59	3	60	15	Privilege; Relevance; attorney colloquy

61	16	61	19	Leading
61	20	62	1	Leading
63	19	63	25	Leading
65	2	65	5	Leading
65	20	66	4	Leading; incomplete
67	6	67	18	Incomplete; no question
68	3	68	8	Privilege; Relevance; 403
69	17	69	23	Privilege; 602; form (speculation)
70	20	70	22	Leading; 602; form (speculation)
71	1	71	5	Privilege; 403
76	7	76	10	Privilege
76	11	77	11	Relevance; attorney colloquy
77	13	77	20	Privilege; 403
77	21	77	24	Privilege
78	1	78	7	Privilege; attorney colloquy is irrelevant
78	14	78	22	701; Foundation; 403
78	25	79	6	701; Foundation; 403
79	9	79	13	701; Foundation; Leading; 403
79	16	79	21	701; Leading; Foundation; 403
79	24	80	4	701; Leading; Foundation; 403
80	12	80	20	701; Foundation; 403
83	11	83	17	Leading; 602
84	19	84	23	602; Leading; form (assumes facts, no such evidence)
85	2	85	10	Leading; Incomplete
85	13	85	16	Leading
85	25	86	4	Compilation; Ex 14 is not one document; compilation of various documents
86	5	86	8	Privilege; Compilation
86	12	86	19	701; Leading; Compilation
86	22	87	1	701; Leading; Compilation
87	22	88	1	701; Leading
88	5	88	11	701; Leading
88	12	89	4	Relevance; attorney colloquy
89	6	89	10	701; Leading
90	6	90	11	Leading; Privilege
90	14	90	20	701; Leading
90	23	91	6	701
91	9	91	15	701
91	18	91	21	Incomplete; 701
91	22	92	2	701; Leading; Form (speculation)

92	14	92	16	Leading; Form (vague); Privilege
92	21	92	25	701; Foundation
93	11	93	15	Leading
93	22	93	25	Leading; 602; Form (speculation)
95	3	95	5	Privilege
95	6	95	14	Leading; 701; Form (mischaracterizes document and assumes facts of photos of Ex 12 related to Ex 14)
95	17	95	22	Leading; 701; Form (mischaracterizes document and assumes facts of photos of Ex 12 related to Ex 14)
98	9	98	12	403; Privilege
99	14	99	21	Relevance; Leading; 403
99	24	100	7	Relevance; 403
102	12	102	25	Relevance; 403
103	1	103	6	Relevance; 403; Leading
103	8	103	12	Leading
103	15	103	25	701; Relevance; 403
104	13	106	14	Relevance; 403
106	15	106	19	701; Relevance; 403
106	22	114	3	Relevance; 403
115	15	115	21	Relevance; 403
116	6	116	10	Leading; Form
122	4	122	6	Incomplete; no question pending
129	19	129	22	Relevance; attorney colloquy
130	17	130	17	Counter-Designation; for completeness
149	18	149	24	Counter-Designation; for completeness
156	11	156	15	Relevance; attorney colloquy
160	16	160	17	Counter-Designation for completeness
167	16	168	2	Counter-Designation
169	19	169	21	Counter-Designation
169	23	169	24	Counter-Designation
184	11	184	16	Incomplete; Relevance
185	9	185	10	Privilege
185	20	185	1	Privilege
192	19	193	8	Privilege; 403; Relevance
193	13	193	19	Relevance; 403
196	25	197	19	Relevance; 403

**DEPOSITION EXCEPRT OBJECTIONS AND
COUNTER-DESIGNATIONS FROM
DEPOSITION TESTIMONY OF RAYMOND WILK**

Date of Deposition: August 26, 2008

From		To		Objection
Page	Line	Page	Line	
24	22	25	8	Counter-Designation
25	21	27	7	602; Foundation
28	1	28	24	Relevance; 602; Foundation
32	11	33	2	Foundation; 602
33	9	33	14	Foundation; 602; Relevance
36	24	37	2	Relevance; 602
42	6	43	1	602; Foundation; Hearsay
44	9	44	12	Counter-Designation
55	15	55	25	602; Relevance
56	15	59	15	60; Relevance; Hearsay
60	19	60	23	Counter-Designation
62	4	62	13	Counter-Designation
62	19	74	6	602; Foundation
74	15	75	5	Counter-Designation
75	19	77	12	602; Foundation
78	16	80	10	602; Foundation
80	11	80	17	Counter-Designation
81	8	81	19	602; Foundation
82	14	82	25	602; Foundation; Relevance
83	10	86	13	602; Foundation; Relevance
91	3	91	7	602
101	25	102	6	Counter-Designation
107	10	107	22	Counter-Designation
108	24	109	5	602
113	2	113	4	Counter-Designation
114	15	114	20	501; Incomplete
114	21	115	8	Relevance
119	12	119	15	Counter-Designation
123	5	123	7	Counter-Designation
124	9	124	11	Counter-Designation
126	12	126	15	602
129	11	129	13	Counter-Designation
131	12	131	25	Counter-Designation
135	24	136	5	602
140	2	140	25	602; Hearsay
145	2	145	12	602; Hearsay; Foundation
145	17	145	24	602; Foundation; Hearsay
146	6	146	14	602
147	22	148	1	602; Foundation

148	8	148	23	602; Foundation
149	9	150	18	602; Foundation
150	19	150	23	Counter-Designation
151	5	151	21	602; Foundation
152	4	152	8	602; Foundation
152	10	152	12	602; Foundation
152	14	152	15	602; Foundation
153	6	153	17	602; Foundation
153	19	154	5	602; Foundation
162	9	162	10	602; Foundation
162	12	162	12	602; Foundation
163	24	164	1	Counter-Designation
166	16	166	19	Counter-Designation
167	22	167	25	Counter-Designation
169	10	169	18	602; Foundation
169	19	169	22	602
169	25	170	4	Counter-Designation
170	8	170	25	602; Foundation
176	3	176	8	602; Foundation
176	12	177	18	602; Foundation
177	23	178	13	602; Foundation
178	18	179	7	602; Foundation
184	8	184	25	602; Foundation; Hearsay
187	8	187	11	Counter-Designation
192	18	192	6	602; Foundation
197	11	197	23	602; Foundation
197	24	197	25	Counter-Designation
198	1	199	23	602; Foundation
199	25	200	12	602; Foundation
200	20	201	2	602; Foundation
201	4	201	7	602; Foundation
201	9	201	13	602; Foundation
204	23	205	14	Counter-Designation
206	20	206	25	Counter-Designation
207	8	209	3	602; Foundation
212	2	213	5	Counter-Designation
213	6	213	11	Hearsay
214	18	215	6	403; Privilege
217	9	218	7	403; Privilege; 602
218	11	218	23	Counter-Designation
219	2	219	25	602; Foundation
220	5	220	8	602; Foundation
220	10	220	15	602; Foundation
220	21	220	23	602; Foundation
221	7	221	9	602; Foundation
221	25	222	5	602; Foundation

225	20	226	5	Counter-Designation
229	12	229	23	Counter-Designation
232	5	232	5	Incomplete; 602
233	16	233	21	602; Foundation
234	4	234	18	602; Foundation
243	17	243	25	602; Foundation

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record, who are deemed to have consented to electronic service are being served this 7th day of October, 2008 with a copy of this document via the Court's CM/ECF system per Local Rule CD-5(a)(3).

/s/ Justin A. Nelson
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